# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA TALLAHASSEE DIVISION

UNITED STATES OF AMERICA

v.		SEALED <u>INDICTMENT</u>
TORRY WILLIAMS		4:17er21-MW
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#### THE GRAND JURY CHARGES:

#### **COUNT ONE**

Between on or about November 21, 2012, and on or about June 5, 2013, in the Northern District of Florida and elsewhere, the defendant,

## TORRY WILLIAMS,

knowingly and willfully did receive, conceal, and retain with the intent to convert to his own use and gain, money of the United States, to wit, money of the Internal Revenue Service, an agency of the United States, in an approximate amount of \$149,847, knowing such money to have been embezzled, stolen, and converted.

In violation of Title 18, United States Code, Sections 641 and 2.

#### **COUNT TWO**

Between on or about November 21, 2012, and on or about June 5, 2013, in the Northern District of Florida and elsewhere, the defendant,

## TORRY WILLIAMS,

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the name, date of birth, and social security number of M.W., G.L.W., B.T., K.G.T., D.T., B.D.T., B.S., B.S.S., D.A.T., H.C.D., V.L.T., H.T., R.A., and H.A., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, theft of government money as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Section 1028A(a)(1).

#### **CRIMINAL FORFEITURE**

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

From his engagement in the violation alleged in Count One of this Indictment, the defendant,

## TORRY WILLIAMS,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all of the

defendant's right, title, and interest in any property, real and personal, constituting, and derived from, proceeds traceable to such offense.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL:

4.4-1

DATE

CHRISTOPHER P. CANOVA

United States Attorney

MICHAEL J. HARWIN

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